

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

In re C. R. Bard, Inc.
Pelvic System Products Liability Litigation
MDL No. 2187

Civil Action No. 2:15-cv-01605

SHORT FORM COMPLAINT

Come now the Plaintiff(s) named below, and for their Complaint against the Defendants named below, incorporate The Master Complaint in MDL No. 2187 by reference. Plaintiff(s) further show the court as follows:

1. Female Plaintiff

Patricia A. Sanchez

2. Plaintiff Husband

Joseph G. Sanchez

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator)

Not Applicable

4. State of Residence

New Mexico

5. District Court and Division in which action is to be filed upon transfer from the MDL.

USDC – Eastern District of Pennsylvania

6. Defendants (Check Defendants against whom Complaint is made):

- ☒ A. C. R. Bard, Inc. (“Bard”)
☐ B. Sofradim Production SAS (“Sofradim”)
☒ C. Tissue Science Laboratories Limited (“TSL”)

- ☒ D. Ethicon, Inc.
- ☒ E. Johnson & Johnson
- ☐ F. American Medical Systems, Inc. ("AMS")
- ☐ G. Boston Scientific Corporation
- ☐ H. Mentor Worldwide LLC
- ☐ I. Coloplast Corp.
- ☐ J. Cook Incorporated
- ☐ K. Cook Biotech, Inc.
- ☐ L. Cook Medical, Inc.
- ☐ M. Desarrollo e Investigación Médica Aragonesa, S.L. ("DIMA")
- ☐ N. Neomedic International, S.L.
- ☐ O. Neomedic Inc.
- ☐ P. Specialties Remeex International, S.L.

7. Basis of Jurisdiction

- ☒ Diversity of Citizenship

8.

a. Paragraphs in Master Complaint upon which venue and jurisdiction lie:

Paragraphs 2-8

b. Other allegations of jurisdiction and venue

Defendants Bard and TSL have significant contacts and regularly conduct business in Pennsylvania, specifically within the Eastern District of Pennsylvania.

9. Defendants' products implanted in Plaintiff (Check products implanted in Plaintiff)

- ☐ A. The Align Urethral Support System;
- ☐ B. The Align TO Urethral Support System;
- ☐ C. The Avaulta Anterior BioSynthetic Support System;
- ☐ D. The Avaulta Posterior BioSynthetic Support System;
- ☐ E. The Avaulta Plus Anterior Support System;
- ☐ F. The Avaulta Plus Posterior Biosynthetic Support System;
- ☐ G. The Avaulta Solo Anterior Synthetic Support System;
- ☐ H. The Avaulta Solo Posterior Synthetic Support System;
- ☐ I. The InnerLace BioUrethral Support System;
- ☐ J. The Pelvicol Acellular Collagen Matrix;
- ☐ K. The PelviLace BioUrethral Support System;
- ☐ L. The PelviLace TO Trans-obturator BioUrethral Support System;
- ☒ M. The PelviSoft Acellular Collagen BioMesh;
- ☐ N. The Pelvitex Polypropylene Mesh;
- ☐ O. The Uretex SUP Purbourethral Sling;
- ☐ P. The Uretex TO Trans-obturator Urethral Support System;
- ☐ Q. The Uretex TO2 Trans-obturator Urethral Support System; and
- ☐ R. The Uretex TO3 Trans-obturator Urethral Support System.
- ☒ S. Other

Ginecare TVT Device by Ethicon, Inc. and Johnson & Johnson

10. Defendants' Products about which Plaintiff is making a claim. (Check applicable products)

- ☐ A. The Align Urethral Support System;
- ☐ B. The Align TO Urethral Support System;
- ☐ C. The Avaulta Anterior BioSynthetic Support System;
- ☐ D. The Avaulta Posterior BioSynthetic Support System;
- ☐ E. The Avaulta Plus Anterior Support System;
- ☐ F. The Avaulta Plus Posterior Biosynthetic Support System;
- ☐ G. The Avaulta Solo Anterior Synthetic Support System;
- ☐ H. The Avaulta Solo Posterior Synthetic Support System;
- ☐ I. The InnerLace BioUrethral Support System;
- ☐ J. The Pelvicol Acellular Collagen Matrix;
- ☐ K. The PelviLace BioUrethral Support System;
- ☐ L. The PelviLace TO Trans-obturator BioUrethral Support System;
- ☒ M. The PelviSoft Acellular Collagen BioMesh;
- ☐ N. The Pelvitex Polypropylene Mesh;
- ☐ O. The Uretex SUP Purbourethral Sling;
- ☐ P. The Uretex TO Trans-obturator Urethral Support System;
- ☐ Q. The Uretex TO2 Trans-obturator Urethral Support System; and
- ☐ R. The Uretex TO3 Trans-obturator Urethral Support System.
- ☒ S. Other

Ginecare TVT Device by Ethicon, Inc. and Johnson & Johnson

11. Date of Implantation as to Each Product

04/19/2004

12. Hospital(s) where Plaintiff was implanted (including City and State)

Northeastern Regional Hospital
Albuquerque, NM

13. Implanting Surgeon(s)

Akhil Das, MD

14. Counts in the Master Complaint brought by Plaintiff(s)

☒ Count I

☒ Count II

☒ Count III

☒ Count IV

☒ Count V

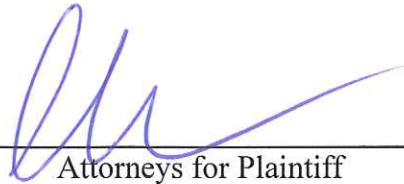
☒ Count VI

☒ Count VII (by the Husband)

☒ Count VIII

☐ Other _____ (please state the facts supporting this Count in the space, immediately below)

☐ Other _____ (please state the facts supporting this Count in the space, immediately below)



Attorneys for Plaintiff

Address and bar information:

KLINE & SPECTER
A Professional Corporation
The Nineteenth Floor
1525 Locust Street
Philadelphia, PA 19102
(215) 772-1000 (phone)
(215) 735-0960 (fax)
lee.balefsky@klinespecter.com
michelle.tiger@klinespecter.com

Thomas Kline, Esquire/28895

Lee B Balefsky, Esquire/25321

Michelle L Tiger, Esquire/43872